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May 8, 2023

VIA EMAIL & ECF

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Gilbert Armenta, 17 Cr. 556 (ER)

Dear Judge Ramos:

On behalf of Gilbert Armenta, we respectfully submit this corrected request seeking a modification of Mr. Armenta's bail conditions to permit Mr. Armenta to travel between Florida and California on multiple occasions between May 8 and May 30, 2023 to attend to his mother, with a requirement that he provide the Government and Probation with each round trip itinerary in advance of any out-of-state travel, and that Probation would need to approve each proposed trip.¹ Subject to these conditions, the United States Attorney's Office for the Southern District of New York consents to this request.

On May 1, the Court granted Mr. Armenta's application to postpone his surrender date from May 1 until May 31, 2023 so that he may attend to his mother and arrange home care and potentially hospice care for her future in light of her rapidly deteriorating health. (ECF 84.) Mr. Armenta's mother is currently in a rehab facility and thereafter will need to be admitted to an assisted living facility. With the court's permission, Mr. Armenta intends to travel to California on May 10 to assist with this process, and expects he will need to return to California during the month of May to continue assisting his mother.

Mr. Armenta thanks the Court for its consideration of this request.

¹ On May 4, we submitted a substantially similar request, which the Court granted today. (ECF 85-86.) This application has been corrected to reflect that Mr. Armenta will be traveling from Florida, where he resides, rather than New York. Additionally, this application includes in the second paragraph Mr. Armenta's updated date of planned departure, May 10.

Respectfully submitted,

/s/ Marc A. Weinstein
Marc A. Weinstein

cc: AUSA Christopher DiMase
AUSA Nicholas Folly
AUSA Juliana Murray
AUSA Kevin Mead
Senior Probation Officer Garry Hackett